

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: ALEXANDER E. JONES

Debtor.

§

CASE NO. 22-33553 (CML)

§

Chapter 7

ALEXANDER E. JONES EXPEDITED MOTION FOR CONTINUANCE

Expedited relief has been requested. If the Court considers the motion on an expedited basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the expedited consideration is not warranted, you should file an immediate response

TO THE HONORABLE CHRISTOPHER LOPEZ, UNITED STATES BANKRUPTCY JUDGE

Alexander E. Jones files this Motion for Continuance seeking a continuance of the Hybrid Status Conference Scheduled for May 9, 2025, and would show the Court the following:

1. The Court set Hybrid Status Conferences in four matters for May 9, 2025.¹
2. Shelby A. Jordan, lead bankruptcy counsel for Alexander E. Jones is scheduled to be out of the Country in a place with limited and sporadic cell phone or internet service on the date set by the Court pursuant to his Notice of Attorney Out of Office Notice through May 23, 2025 [Dkt. #1115].
3. Attorney Jordan believes his presence at the hearing may be important to properly and adequately respond to this Court's questions and to, as fully as practical, be available to this Court to explain, clarify, or present argument on the critical issues raised by the Jones pleadings.
4. Accordingly, Attorney Jordan respectfully requests that the Court's status

¹ (1) 22-33553 – Alexander E. Jones Chapter 7; (2) 24-03279 – Wheeler, et al. v Jones, et al.; (3) 23-03035 – Heslin, et al. v Jones, et al.; (4) 23-03037 – Wheeler, et al. v Jones, et al.

conference be set for a date after Mr. Jordan's return the day after Memorial Day holiday on May 26, 2025, excluding two hearings in unrelated bankruptcy hearings, the first on June 2, 2025 in McAllen, Texas and the second on June 6, 2025, in San Antonio, Texas.

REQUEST FOR EXPEDITED CONSIDERATION

Alexander E. Jones requests expedited consideration of this Motion. The expedited basis is not for delay but to allow the Debtor the opportunity to prepare for such a hearing and allow Mr. Jones main bankruptcy attorney to be able to appear live. As such, Alexander E. Jones believes that expedited consideration of the Motion is warranted.

WHEREFORE, Alexander E. Jones prays this Court grant the relief above requested, and for such other and further relief to which Jones is justly entitled, at law and in equity.

Dated: April 30, 2025

/s/ Shelby A. Jordan

SHELBY A. JORDAN
State Bar No. 11016700
S.D. No. 2195
ANTONIO ORTIZ
State Bar No. 24074839
S.D. No. 1127322
Jordan & Ortiz, P.C.
500 North Shoreline Blvd., Suite 804
Corpus Christi, TX 78401
Telephone: (361) 884-5678
Facsimile: (361) 888-5555
Email: sjordan@jhwclaw.com
aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

COUNSEL FOR ALEXANDER E. JONES

/s/ Ben Broocks

Ben C Broocks
State Bar No. 03058800
Federal Bar No. 94507
William A. Broocks
St. Bar No. 24107577
Federal Bar No. 3759653

BROOCKS LAW FIRM PLLC
248 Addie Roy Road, Suite B301
Austin, Texas 78746
Phone: (512) 201-2000
Fax: (512) 201-2032
Email: bbroocks@broockslawfirm.com
CO-COUNSEL FOR ALEX JONES

CERTIFICATE OF ACCURACY

The undersigned hereby certifies that, to the best of my knowledge, the statements regarding the reasons expedited relief has been requested are the true and accurate reasons expedited relief was requested. This statement is being made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Shelby A. Jordan
Shelby A. Jordan

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon all parties registered to receive notices via the Court's ECF noticing system on April 30, 2025 as well as the following parties.

/s/ Shelby A. Jordan
Shelby A. Jordan